

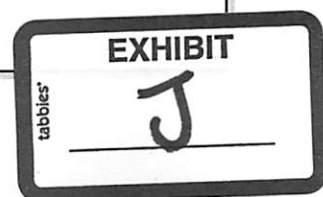
James Benny Jackson v. Oil-Dri Corporation of America, et al.

Tammy Jackson, FNP

September 7, 2017



Mississippi - Louisiana - Tennessee - New York
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1 A. All right.

2 Q. Are you aware of a time in April of 2015
3 where Mr. Jackson was being treated by a
4 pulmonologist?

5 A. Not to my knowledge. He does list
6 sarcoidosis as an existing illness.

7 Q. What is sarcoidosis?

8 A. I would have to look it up to give you the
9 exact definition, but it does list that as his --
10 along with bronchitis, irregular heartbeats.

11 Q. Do you have any knowledge around April 27
12 of Mr. Jackson taking family medical leave from his
13 job?

14 A. No. In 2015?

15 Q. Yes.

16 A. No.

17 Q. So I would take it that you don't have any
18 knowledge as to whether he was able to work in July
19 of 2015?

20 A. I don't have any knowledge of that.

21 Q. Do you have any knowledge regarding what
22 Mr. Jackson's job was in July of 2015?

23 A. No.

24 Q. With regard to your treatment of
25 Mr. Jackson in April -- I'm sorry, in August of 2015,

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1 do you have any opinion as to whether his condition
2 prevented him from working at that time?

3 A. No. No knowledge of that.

4 Q. Do you know if he even had a job in August
5 of 2015?

6 A. No. It's not on the record.

7 MS. CANNADY: Let me mark the expert
8 designation as Exhibit 3.

9 (Exhibit No. 3 -- Plaintiff's
10 Designation of Expert Witnesses -- marked for
11 identification and may be found attached to the
12 transcript.)

13 Q. (Ms. Cannady) Ms. Jackson, I hand you
14 Exhibit 3, which is the expert designation of
15 Mr. Jackson in this case. If you'll flip I think
16 about to the third page, you'll see your name listed.

17 A. Yes.

18 Q. I'm going to look with you because that's
19 the only copy that I have.

20 A. Okay.

21 Q. All right. If you will look at -- review
22 facts known. It says, "Providers have knowledge
23 regarding Plaintiff's diagnosis, onset of the
24 conditions and prognosis." Do you have any
25 information regarding Mr. Jackson's diagnosis, and

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1 I'm not sure of diagnosis of what is meant in that,
2 or his condition or any prognosis?

3 A. I only have diagnosis that were listed for
4 that day, which were as I mentioned.

5 Q. Okay. And have we discussed -- if you look
6 at down to opinions held, treated him for general
7 ailments, such as pharyngitis, and prostatitis. And
8 then treated him for pulmonary issues, such as
9 sarcoidosis, bronchitis, shortness of breath and
10 irregular heartbeat. Have you ever treated
11 Mr. Jackson for any of these ailments?

12 A. No. They're just listed as a medical
13 history.

14 Q. All right. I'm going to ask you your
15 familiarity with the ADA. And Mr. Jackson in this
16 case has alleged violations of the Americans With
17 Disabilities Act against his employer Oil-Dri. So I
18 want to go through -- and you're not a lawyer and I
19 don't expect you to have this knowledge, but I'm
20 going to go through some of the things that are
21 contained in this statute that are called major life
22 activities. I want to know whether you have an
23 opinion as to whether Mr. Jackson's -- any medical
24 condition has a substantial impact on these or an
25 impairment of these major life activities that are

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1 listed in the statute.

2 All right. Caring for oneself.

3 A. What are you asking me?

4 Q. I mean, as far as you know, in your opinion
5 is Mr. Jackson able to care for himself?

6 A. On that day?

7 Q. I want to focus on in July of 2015, that
8 time frame?

9 A. I didn't see him until September 2015, so I
10 really couldn't answer that.

11 Q. What about -- I'm just going to go through
12 the list and if you want to say same answer, if that
13 is your answer --

14 A. Okay.

15 Q. -- that will be fine. Performing manual
16 tasks?

17 A. Same answer.

18 Q. Seeing?

19 A. Seeing visually?

20 Q. Yes.

21 A. Same answer.

22 Q. Hearing?

23 A. Same answer.

24 Q. Eating?

25 A. Same answer.

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1 Q. Sleeping?

2 A. Same answer.

3 Q. Walking?

4 A. Same answer.

5 Q. Standing?

6 A. Same answer.

7 Q. Lifting?

8 A. Same answer.

9 Q. Bending?

10 A. Same answer.

11 Q. Speaking?

12 A. Same answer.

13 MR. WOODRUFF: I'm sorry. Ms.

14 Jackson, I can't hear you. Can you speak up a
15 little, please?

16 THE WITNESS: Yes.

17 Q. (Ms. Cannady) The last one was speaking.

18 A. I said same answer.

19 Q. Breathing?

20 A. Same answer.

21 Q. Learning?

22 A. Same answer.

23 Q. Reading?

24 A. Same answer.

25 Q. Concentrating?

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1 A. Same answer.

2 Q. Thinking?

3 A. Same answer.

4 Q. Communicating?

5 A. Same answer.

6 Q. Working?

7 A. Same answer.

8 Q. All right. Do you have an opinion as to
9 whether in July of 2015 Mr. Jackson had any condition
10 that would have affected his immune system?

11 A. No. I didn't see him until August of '15.

12 Q. Normal cell growth?

13 A. Same answer.

14 Q. His digestive system?

15 A. Same answer.

16 Q. Bowels?

17 A. Same answer.

18 Q. Bladder?

19 A. Same answer.

20 Q. His neurological system?

21 A. Same answer.

22 Q. Brain?

23 A. Same answer.

24 Q. Respiratory?

25 A. Same answer.

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1 Q. Circulatory?

2 A. Same answer.

3 Q. Endocrine?

4 A. Same answer.

5 Q. Reproductive function?

6 A. Same answer.

7 MR. WOODRUFF: Ms. Jackson, can you
8 state for the record, what is the same answer? Can
9 you repeat that again? Can you state that again?

10 THE WITNESS: I did not see the
11 patient until August of 2015, so I have no knowledge
12 of that in July.

13 MR. WOODRUFF: When you say same
14 answer, you're saying you have no knowledge; would
15 that be correct?

16 THE WITNESS: Right. Thank you.

17 Q. (Ms. Cannady) And so you can't render an
18 opinion as to whether any of these major life
19 functions or these body systems were impacted by any
20 illness or impairment by Mr. Jackson in July of 2015?

21 A. No.

22 MS. CANNADY: Ron, that's all I have.

23 MR. WOODRUFF: I just have a few
24 follow-up.

25 EXAMINATION